

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE NORTHERN ASSURANCE COMPANY
OF AMERICA and AMERICAN HOME
ASSURANCE COMPANY,

Case No.:
08 CV 3289 (CSH) (AJP)

Plaintiffs,

ECF CASE

- against -

LAFARGE NORTH AMERICA, INC. and
AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY
ASSOCIATION, INC.,

Defendants.

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**NOTICE OF MOTION OF NEW YORK MARINE AND GENERAL
INSURANCE COMPANY TO INTERVENE AS A PLAINTIFF**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated July 16, 2008, and the Declaration of David H. Fromm dated July 16, 2008, submitted herewith, New York Marine and General Insurance Company will move before The Honorable Charles S. Haight of the United States District Court for the Southern District of New York, at a date and time to be determined by the Court, at the United States Courthouse at 500 Pearl Street, New York, New York 10007 for an Order, pursuant to Rule 24 of the Federal Rules of Civil Procedure, permitting New York Marine and General Insurance Company to intervene as a plaintiff in this action.

PLEASE TAKE FURTHER NOTICE that any answering and reply papers shall be served in accordance with Local Civil Rule 6.1(b).

Dated: July 16, 2008
New York, New York

Respectfully submitted,

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Attorneys for Intervenor Plaintiff
*New York Marine and
General Insurance Company*

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